Statement of Basis of the Federal Operating Permit

Phillips 66 Pipeline LLC

Site Name: Pasadena Product Terminal
Physical Location: 233 N Phillips Road
Nearest City: Pasadena
County: Harris

Permit Number: O106
Project Type: Renewal

Standard Industrial Classification (SIC) Code: 5171
SIC Name: Petroleum Bulk stations and Terminals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;
A basis for applying permit shields;
A list of the federal regulatory applicability determinations;
A table listing the determination of applicable requirements;
A list of the New Source Review Requirements;
The rationale for periodic monitoring methods selected;
The rationale for compliance assurance methods selected;
A compliance status; and
A list of available unit attribute forms.

Prepared on: January 18, 2017

Operating Permit
Basis of Determination

Permit Area Process Description
The ConocoPhillips Pipe Line Pasadena Terminal is a petroleum products storage terminal. The facility handles distillate products (kerosene, diesel), gasoline, transmix and petroleum additives. All materials, with the exception of the petroleum additives, are received via pipeline. The materials pass through the terminals manifold area and are routed either to storage, or out via pipe line to various off-site sources. The distillate products which are routed to storage are kept in five different fixed roof tanks (TK-1502, TK-1503, TK-2305, TK-3001, TK-3002). The gasoline which is routed to storage is stored in 12 different tanks which are equipped with either an internal or external floating roof (TK-1201, TK-1202, TK-1301, TK-1501, TK-1701, TK-2101, TK-2301, TK-2304, TK-801, TK-802), and the transmix which is routed to storage is stored in three different internal floating roof tanks (TK-101, TK-201, TK-202). The gasoline and transmix tanks may also be used in storing distillate products when the tanks are not in gasoline or transmix service. The petroleum additives which are received by tank truck are loaded into 6 different fixed roof tanks (CADD-1, DSADD-1, PADD-1, PADD-2, PADD-3, SADD-1). Propane is also stored at the site in a pressure vessel (TK-011). Ethanol is also stored on site in TK-501. Materials, once in storage, can be routed to other storage tanks, to loading bays and then into tank trucks to be sent off-site, or back to the main manifold area to be sent off-site via pipeline.

Five loading bays at the site (BAY-1, BAY-2, BAY-3, BAY-4, BAY-5) are used to transfer gasoline and distillate products into tank trucks. Emissions resulting from uncaptured vapors displaced from the tank trucks during loading at loading bays 1 and 2, and loading bays 3, 4, and 5 are routed to vapor combustors VCU2 and VCU1 respectively. A propane blowdown flare (PRO-FL) is also present onsite and it is used for the control of emergency blowdown from propane manifold pressure relief valves, a pig trap, a propane filter, and pump seal pots.

Spills, tank water draws, and other wastewaters are routed to an oil/water separator (OWS-1). Petroleum products from OWS-1 are routed to one of the three transmix tanks, and the separated oily water is routed to a wastewater treatment system. Other units at the site are facility wide fugitives (FUG-1), a product sump (SUMP), a remote reservoir cold solvent cleaner (PT-CLNR), a vapor absorber tower (VA-1) and associated vapor absorber sump (VA-SUMP), and lean oil tank (TK-LOIL).

FOPs at Site
The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants
The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, NOX

Reading State of Texas's Federal Operating Permit
The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
    - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
    - Additional Monitoring Requirements
    - New Source Review Authorization Requirements
    - Compliance Requirements
    - Protection of Stratosphere Ozone
    - Permit Location
    - Permit Shield (30 TAC § 122.148)
- Attachments
    - Applicable Requirements Summary
        - Unit Summary
        - Applicable Requirements Summary
    - Additional Monitoring Requirements
    - Permit Shield
    - New Source Review Authorization References
    - Compliance Plan
    - Alternative Requirements
- Appendix A
    - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A.(iv) for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations
The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields
An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A

permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities
In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements
The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility
When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
EMER-GEN	40 CFR Part 60, Subpart JJJJ	60JJJJ	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification after June 12, 2006. Manufactured Date = Date of manufacture is on or after January 1, 2011. Displacement = Engine displacement is greater than or equal to 225cc. Test Cell = The SI ICE is not being tested at an engine test cell/stand. Certified = Purchased a certified SI ICE. National Security = The SI ICE is not eligible for exemption due to national security. Operation = Operating and maintaining the certified SI ICE and control device according to manufacturer's written instructions. Temp Replacement = The SI ICE is not acting as a temporary replacement. Certified Modification = Purchased, or otherwise own/operate, a modified/reconstructed SI ICE that is not certified. Horsepower = Maximum engine power greater than or equal to 130 HP and less than 500 HP. Fuel = SI ICE that uses natural gas. Service = SI ICE is an emergency engine. Lean Burn = The SI ICE is a lean-burn engine. Commencing = SI ICE that is commencing new construction.
EMER-GEN	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	HAP Source = Any stationary source of hazardous air pollutants that is not a major source as defined in 40 CFR § 63.2. Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.
ETHANOL TK	30 TAC Chapter 115, Storage of VOCs	R5-115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof (IFR) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Primary Seal = Mechanical shoe Product Stored = VOC other than crude oil or condensate Secondary Seal = Any/none Storage Capacity = Capacity is greater than 40,000 gallons
ETHANOL TK	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-TNKS-1	30 TAC Chapter 115, Storage of VOCs	R5-115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof (IFR) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Primary Seal = Mechanical shoe Product Stored = VOC other than crude oil or condensate Secondary Seal = Any/none Storage Capacity = Capacity is greater than 40,000 gallons
GRP-TNKS-1	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = After March 8, 1974 and on or before May 19, 1978 Storage Capacity = Capacity is greater than 65,000 gallons (246,052 liters) Product Stored = Petroleum (other than crude oil) or condensate True Vapor Pressure = True vapor pressure is at least 1.5 psia and less than 11.1 psia Storage Vessel Description = Floating roof (internal or external) Reid Vapor Pressure = Reid vapor pressure at least 1.0 psia
GRP-TNKS-1	40 CFR Part 63, Subpart R	63R-1	Storage Capacity = Capacity is at least 20,000 gallons (75,708 liters) Alternate Means of Emission Limitation = Not using an alternate means of emission limitation (AMEL) as it pertains to 40 CFR Part 63, Subpart R. Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal Subject to NSPS Kb = Storage vessel is not subject to 40 CFR Part 60, Subpart Kb
GRP-TNKS-2	30 TAC Chapter 115, Storage of VOCs	R5-115-3	Construction Date = On or after May 12, 1973 Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.0 psia Primary Seal = Any/none Product Stored = VOC other than crude oil or condensate Secondary Seal = Any/none Storage Capacity = Capacity is greater than 40,000 gallons Throughput = The liquid throughput is greater than 1,500 barrels.

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-TNKS-2	40 CFR Part 60, Subpart Ka	60Ka-2	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is greater than 40,000 gallons (151,416 liters) True Vapor Pressure = TVP is less than 1.5 psia Storage Vessel Description = Emission controls not required (fixed roof) Reid Vapor Pressure = Reid vapor pressure is less than 1.0 psia Maximum True Vapor Pressure = Maximum true vapor pressure is less than or equal to 1.0 psia
GRP-TNKS-3	30 TAC Chapter 115, Storage of VOCs	R5-115-3	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.0 psia Primary Seal = Any/none Product Stored = VOC other than crude oil or condensate Secondary Seal = Any/none Storage Capacity = Capacity is greater than 40,000 gallons
GRP-TNKS-4	30 TAC Chapter 115, Storage of VOCs	R5-115-4	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
GRP-TNKS-5	30 TAC Chapter 115, Storage of VOCs	R5-115-2	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Welded tank using an external floating roof True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Primary Seal = Mechanical shoe Product Stored = VOC other than crude oil or condensate Secondary Seal = Rim-mounted Storage Capacity = Capacity is greater than 40,000 gallons

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-TNKS-5	40 CFR Part 63, Subpart R	63R-2	Storage Capacity = Capacity is at least 20,000 gallons (75,708 liters) Alternate Means of Emission Limitation = Not using an alternate means of emission limitation (AMEL) as it pertains to 40 CFR Part 63, Subpart R. Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal Subject to NSPS Kb = Storage vessel is not subject to 40 CFR Part 60, Subpart Kb EFR Not Meeting Rim Seal Requirements = Storage vessel has an external floating roof which meets 40 CFR Part 60, Subpart Kb rim seal requirements as of December 14, 1994.
GRP-TNKS-6	30 TAC Chapter 115, Storage of VOCs	R5-115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof (IFR) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Primary Seal = Mechanical shoe Product Stored = VOC other than crude oil or condensate Secondary Seal = Any/none Storage Capacity = Capacity is greater than 40,000 gallons
GRP-TNKS-6	40 CFR Part 63, Subpart R	63R-1	Storage Capacity = Capacity is at least 20,000 gallons (75,708 liters) Alternate Means of Emission Limitation = Not using an alternate means of emission limitation (AMEL) as it pertains to 40 CFR Part 63, Subpart R. Storage Vessel Description = Fixed roof with an internal floating roof using a mechanical shoe seal Subject to NSPS Kb = Storage vessel is not subject to 40 CFR Part 60, Subpart Kb
GRP-TNKS-7	30 TAC Chapter 115, Storage of VOCs	R5-115-2	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Welded tank using an external floating roof True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Primary Seal = Mechanical shoe Product Stored = VOC other than crude oil or condensate Secondary Seal = Rim-mounted Storage Capacity = Capacity is greater than 40,000 gallons
GRP-TNKS-7	40 CFR Part 60, Subpart Ka	60Ka-1	Product Stored = Petroleum liquid (other than petroleum or condensate) Storage Capacity = Capacity is greater than 40,000 gallons (151,416 liters) True Vapor Pressure = TVP is greater than or equal to 1.5 but less than or equal to 11.1 psia Storage Vessel Description = Pontoon-type or double-deck-type external floating roof (EFR) with mechanical shoe primary seal Reid Vapor Pressure = Reid vapor pressure is greater than or equal to 1.0 psia

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-TNKS-7	40 CFR Part 63, Subpart R	63R-2	Storage Capacity = Capacity is at least 20,000 gallons (75,708 liters) Alternate Means of Emission Limitation = Not using an alternate means of emission limitation (AMEL) as it pertains to 40 CFR Part 63, Subpart R. Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal Subject to NSPS Kb = Storage vessel is not subject to 40 CFR Part 60, Subpart Kb EFR Not Meeting Rim Seal Requirements = Storage vessel has an external floating roof which meets 40 CFR Part 60, Subpart Kb rim seal requirements as of December 14, 1994.
RED DYE	30 TAC Chapter 115, Storage of VOCs	R5-115-6	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is less than or equal to 1,000 gallons
TK-30	30 TAC Chapter 115, Storage of VOCs	R5-115-4	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons Throughput = The liquid throughput is greater than 3,000 barrels.
TLED	30 TAC Chapter 115, Storage of VOCs	R5-115-7	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a submerged fill pipe True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons
TLED	40 CFR Part 60, Subpart Kb	60Kb-2	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia Storage Vessel Description = CVS and control device other than a flare (fixed roof)

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-LDG-1	30 TAC Chapter 115, Loading and Unloading of VOC	R5-115-12A	Chapter 115 Control Device Type = Vapor control system with a vapor combustor. Chapter 115 Facility Type = Gasoline terminal Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected. Product Transferred = Gasoline Vapor Space Holding Tank = the gasoline terminal does not have a variable vapor space holding tank design that can process vapors independent of transport vessel loading or chooses compliance with 30 TAC 115.212(a)(4)(C). Transfer Type = Only loading. True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia. Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(B), (b)(3)(B), (a)(2)(A), and (b)(3)(A) exemptions do not apply to marine terminals or gasoline terminals.
GRP-LDG-1	30 TAC Chapter 115, Loading and Unloading of VOC	R5-115-12B	Chapter 115 Facility Type = Gasoline terminal Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure less than 0.5 psia.
GRP-LDG-1	40 CFR Part 60, Subpart XX	60XX-1	Construction/Modification Date = On or before December 17, 1980 Component Replacement = The replacement of components was not commenced before August 8, 1983 in order to comply with any standard adopted by a state or political subdivision thereof. Vapor Processing System Type = Continuous combustion vapor processing system.
GRP-LDG-1	40 CFR Part 63, Subpart R	63R-4	Vapro Processing System = The vapor processing system operates intermittently. Subpart R Control Device Type = Vapor processing system other than a flare, thermal oxidation system, refrigeration condenser system or carbon adsorption system.
GRP-LDG-2	30 TAC Chapter 115, Loading and Unloading of VOC	R5-115-12A	Chapter 115 Control Device Type = Vapor control system with a vapor combustor. Chapter 115 Facility Type = Gasoline terminal Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected. Product Transferred = Gasoline Vapor Space Holding Tank = the gasoline terminal does not have a variable vapor space holding tank design that can process vapors independent of transport vessel loading or chooses compliance with 30 TAC 115.212(a)(4)(C). Transfer Type = Only loading. True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia. Daily Throughput = Daily throughput not determined since 30 TAC § 115.217(a)(2)(B), (b)(3)(B), (a)(2)(A), and (b)(3)(A) exemptions do not apply to marine terminals or gasoline terminals.

Unit ID	Regulation	Index Number	Basis of Determination*
GRP-LDG-2	30 TAC Chapter 115, Loading and Unloading of VOC	R5-115-12B	Chapter 115 Facility Type = Gasoline terminal Alternate Control Requirement (ACR) = No alternate control requirements are being utilized. Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline. Transfer Type = Only loading. True Vapor Pressure = True vapor pressure less than 0.5 psia.
GRP-LDG-2	40 CFR Part 60, Subpart XX	60XX-2	Construction/Modification Date = After December 17, 1980 Component Replacement = The replacement of components was not commenced before August 8, 1983 in order to comply with any standard adopted by a state or political subdivision thereof. Existing Vapor Processing System = The facility is equipped with an existing vapor processing system. Flare = The facility is not using a flare, as defined in 40 CFR § 60.501, to control vapor emissions. Vapor Processing System Type = Continuous combustion vapor processing system.
GRP-LDG-2	40 CFR Part 63, Subpart R	63R-4	Vapro Processing System = The vapor processing system operates intermittently. Subpart R Control Device Type = Vapor processing system other than a flare, thermal oxidation system, refrigeration condenser system or carbon adsorption system.
GRP-VCU-1	30 TAC Chapter 111, Visible Emissions	R1-111-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
GRP-VCU-1	40 CFR Part 60, Subpart A	60A-2	Subject to 40 CFR § 60.18 = Flare is not subject to 40 CFR § 60.18.
PROP FLR	30 TAC Chapter 111, Visible Emissions	R1-111-1	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
FUG	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5-115-11	Title 30 TAC § 115.352 Applicable = Site is not a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process nor a natural gas/gasoline processing operation as defined in 30 TAC 115.10.
OWS	30 TAC Chapter 115, Water Separation	R5-115-8	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Emission Control Option = The compartment has all openings sealed and totally encloses the liquid contents with gauging and sampling devices that are vapor tight except when in use.
SUMP	30 TAC Chapter 115, Water Separation	R5-115-10	Alternate Control Requirement = The executive director (or the EPA Administrator) has not approved an ACR or exemption criteria in accordance with 30 TAC § 115.910. Exemption = Any single or multiple compartment VOC water separator which is designed solely to capture stormwater, spills, or exterior surface cleanup waters and is fully covered.

* - The “unit attributes” or operating conditions that determine what requirements apply

NSR Versus Title V FOP
The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements
Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 5680	Issuance Date: 08/30/2007
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.355	Version No./Date: 11/01/2001
Number: 106.478	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 51	Version No./Date: 06/07/1996
Number: 69	Version No./Date: 04/04/1975
Number: 70	Version No./Date: 05/08/1972
Number: 79	Version No./Date: 04/04/1975
Number: 86	Version No./Date: 06/07/1996
Number: 100	Version No./Date: 10/04/1995
Number: 107	Version No./Date: 06/07/1996
Number: 118	Version No./Date: 05/12/1981

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the “Maximum Allowable Emission Rate Table”, or “MAERT” for short. Specifically, the MAERT lists the

Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency
Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Compliance Assurance Monitoring (CAM):
Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;

2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and

3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: GRP-LDG-1	
Control Device ID No.: VCU 2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Loading and Unloading of VOC	SOP Index No.: R5-115-12A
Pollutant: VOC	Main Standard: § 115.211(1)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Combustion temperature falls below the 180-minute average temperature of 725 degrees Fahrenheit, established during the 1997 VCU testing.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: GRP-LDG-2	
Control Device ID No.: VCU 1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Loading and Unloading of VOC	SOP Index No.: R5-115-12A
Pollutant: VOC	Main Standard: § 115.211(1)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Combustion temperature falls below the 180-minute average temperature of 725 degrees Fahrenheit, established during the 1997 VCU testing.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Periodic Monitoring:
The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: GRP-LDG-2	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart XX	SOP Index No.: 60XX-2
Pollutant: TOC	Main Standard: § 60.502(a)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Combustion temperature falls below the 180-minute average temperature of 725 degrees Fahrenheit, established during the 1997 VCU testing.	
Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: GRP-TNKS-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart K	SOP Index No.: 60K-1
Pollutant: VOC	Main Standard: § 60.112(a)(1)
Monitoring Information	
Indicator: Internal Floating Roof	
Minimum Frequency: annually	
Averaging Period: n/a	
Deviation Limit: Liquid has accumulated on IFR, seal(s) are detached, holes or tears in seal fabric.	
Basis of monitoring: The option to monitor VOC emissions by visually inspecting the external floating roof or the internal floating roof was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. If the external or internal floating roof is operating in accordance with its design it will meet its control efficiency. Visually inspecting the external floating roof or the internal floating roof is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; and 30 TAC Chapter 115. Measuring and recording the accumulated area of gaps if the tank is equipped with primary seals is commonly required in federal and state rules, including: 40 CFR Part 60, Subpart Kb; 40 CFR Part 61, Subpart Y; 40 CFR 63 Subparts VV, DD, and MMM; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: GRP-TNKS-4	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5-115-4
Pollutant: VOC	Main Standard: § 115.112(e)(1)
Monitoring Information	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: Integrity of fill pipe in question and repairs not made prior to filling.	
Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.	

Unit/Group/Process Information	
ID No.: GRP-TNKS-4	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5-115-4
Pollutant: VOC	Main Standard: § 115.112(e)(1)
Monitoring Information	
Indicator: Record of Tank Construction Specifications	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: Failure to maintain a record of tank construction records (e.g. - engineering drawings) showing fill pipe with clearance of six inches from the bottom, or, in the case of side loading, the discharge opening submerged when liquid is withdrawn.	
Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.	

Unit/Group/Process Information	
ID No.: OWS	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Water Separation	SOP Index No.: R5-115-8
Pollutant: VOC	Main Standard: § 115.132(a)(1)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: monthly	
Averaging Period: n/a	
Deviation Limit: Any gaps or cracks found in sealed openings.	
Basis of monitoring: It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and a recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.	

Unit/Group/Process Information	
ID No.: OWS	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Water Separation	SOP Index No.: R5-115-8
Pollutant: VOC	Main Standard: § 115.132(a)(1)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: annually	
Averaging Period: n/a*	
Deviation Limit: 500 ppm for leaks around covers, 10,000 ppm for shaft seals.	
Basis of monitoring: It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: TK-30	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5-115-4
Pollutant: VOC	Main Standard: § 115.112(e)(1)
Monitoring Information	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: Integrity of fill pipe in question and repairs not made prior to filling.	
Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.	

Unit/Group/Process Information	
ID No.: TK-30	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5-115-4
Pollutant: VOC	Main Standard: § 115.112(e)(1)
Monitoring Information	
Indicator: Record of Tank Construction Specifications	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: Failure to maintain a record of tank construction records (e.g. - engineering drawings) showing fill pipe with clearance of six inches from the bottom, or, in the case of side loading, the discharge opening submerged when liquid is withdrawn.	
Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.	

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on December 2, 2016.
   Site rating: 0.00 / High Company rating: 2.03 / Satisfactory
   (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No
2. Is a compliance plan and schedule included in the permit? .....No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes

OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes